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Plaintiff's Counsel*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SANDAR M. MESA-PEREZ, an individual,

Plaintiff,

v.

SBARRO LLC dba SBARRO PIZZA, a foreign
limited liability company; SBARRO, INC. dba
SBARRO PIZZA, a foreign corporation;
ZACHARY CEBALLES, and individual;
EFRAIN HERNANDEZ, an individual; JESUS
ALATORRE, an individual; DANA DORADO,
an individual,

Defendants.

CASE NO. 2:19-cv-373-APG-NJK

**STIPULATION AND (PROPOSED)
ORDER TO EXTEND TIME TO FILE
OPPOSITION TO DANA DORADO'S
MOTION FOR ATTORNEY'S FEES AND
COSTS PURSUANT TO THE COURT'S
ORDER GRANTING RULE 11
SANCTIONS AGAINST PLAINTIFF'S
COUNSEL (DOCKET NO. 180)**

The parties herein, by and through their attorneys of record, hereby stipulate and agree to the following:

1. On September 30, 2020, the Court filed an Order (1) Granting Motion for Sanctions Under Rule 11 and (2) Denying Motion for Sanctions Under 28 U.S.C. §1927 and the Court's Inherent Powers [Doc 177].

2. In the Order, the Court directed that "the parties must confer about the amount of those fees and costs by October 28, 2020. See Order p. 6:17-18.

3. By November 13, 2020, if the parties were not in agreement, Dorado may file a motion "with supporting affidavits and appropriate documentation requesting reasonable attorneys' fees and costs." See Order p. 6:19-21.

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4. On November 6, 2020, the parties filed a Stipulation and Order to Extend Time to permit Dorado until November 30, 2020 to file Motion for Attorney's Fees and Costs. [Doc 178].

5. On November 9, 2020, the Court granted the Stipulation and Order to Extend Time to permit Dorado until November 30, 2020 to file a Motion for Attorney's Fees and Costs [Doc 179].

6. On November 30, 2020, Dorado filed a Motion for Attorney's Fees and Costs Pursuant to the Court's Order Granting Rule 11 Sanctions Against Plaintiff's Counsel [Doc 180].

7. Opposition to Dorado's Motion is currently due on December 28, 2020.

8. Parties agree and stipulate that Plaintiff's Counsel shall have up to and including **January 4, 2021** to file its Opposition to Dorado's Motion.

9. This stipulation is submitted based upon good cause, and is not made for the purpose of delay.

Dated this 17th day of December, 2020

Dated 17th day of December, 2020

GREENBERG TRAURIG, LLP

LIPSON NEILSON P.C.

/s/ Jason K. Hicks

/s/ Joseph P. Garin

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ORDER

IT IS SO ORDERED.

Dated: December 18, 2020


UNITED STATES DISTRICT COURT JUDGE